

United States District Court - Eastern District Of Wisconsin

"Amy", et al, Plaintiffs

v.

Jeffrey W. Feldman, Defendant

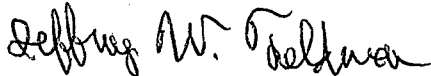
Case No. 14:CV-0721

STIPULATED FACTS IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT

Pursuant to the provisions of Civil L. R. 56(b)(1)(C) Feldman lists the following stipulated facts that support his Motion for Summary Judgment.

As of this juncture the parties have not agreed to any stipulated facts.

DATED: August 15, 2018



Jeffrey W. Feldman
Reg. No. 12551-089
Federal Correctional Institution
PO Box 5000
Oakdale, LA 71463

United States District Court - Eastern District of Wisconsin

"Amy", et al, Plaintiffs

v.

Jeffrey W. Feldman, Defendant

Case No. 14:CV-0721

UNDISPUTED FACTS IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT

Pursuant to the provisions of Fed. R. Civ. P. 56(c)(1) and Civil L. R. 56(b)(1)(C), Feldman lists the following undisputed facts that support his Motion For Summary Judgment.

Undisputed Fact

1. Amy et al had no knowledge of Feldman.
2. Amy et al did not provide initial disclosures.
3. Feldman sent twelve letters to Amy et al regarding initial disclosures.
4. Each plaintiff has collected at least \$10,000,000.
5. At least 25,000 individuals have possessed images of each of the plaintiffs.
6. Amy et al have withdrawn claims 2 and 3.

Record Proving Fact

1. Answer to second set of discovery requests No. 8.
2. Docket 66, Motion to Compel.
3. Docket 66, Motion to Compel.
4. Second set of request for admissions, ¶ 55, ¶ 64, ¶ 72, ¶ 79, ¶ 87, ¶ 95.
5. Second set of request for admissions ¶¶ 17, 23, 29, 35, 41, and 47.
6. Memorandum of Law in Opposition To Defendant Jeffrey W. Feldman's April 13, 2018 Motion for Court Appointed

Experts, pp. 2 and 4. Plaintiffs' Objections and Responses to Defendant's Second Set of Discovery Requests, p. 2.

7. Amy et al will not prove or otherwise demonstrate any actual losses or damages as a result of Feldman's conduct.

7. Memorandum of Law in Opposition To Defendant Jeffrey W. Feldman's April 13, 2018 Motion for Court Appointed Experts, p. 2. Plaintiffs' Objections and Responses to Defendant's Second Set of Discovery Requests, pp. 2, 4-7.

8. Law enforcement failed in 388 attempts to download from Feldman's computer.

8. Affidavit in Support of Application for Search Warrant, ¶ 12. Affidavit of Gerald R. Grant, Jr., ¶ 8.

9. James Marsh selects whom to sue based on their wealth.

9. First set of Request for Admissions, ¶ 5.

10. Carol Hepburn and James Marsh have been ordered to track payments to prevent a windfall or double recovery.

10. Second Set of Request for Admissions, ¶¶ 96 and 97.

11. Feldman's computer was seized 1/24/13.

11. Search and Seizure Warrant, pp. 2-4.

12. Amy et al refused to provide any info on communications between Amy et al and the prosecution.

12. Plaintiffs' Objections and Responses to Defendant's Second Set of Discovery Requests, No. 7.

DATED: August 15, 2018

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